

U.S. Department of Justice



*United States Attorney
Eastern District of New York*

CK/LXN
F.#2010R01079

271 Cadman Plaza East
Brooklyn, New York 11201

January 24, 2012

By ECF & Federal Express

John Nicolas Iannuzzi, Esq.
Law Offices of Iannuzzi and Iannuzzi
74 Trinity Place
New York, New York 10006

Re: United States v. Chang
Criminal Docket No. 11-0067 (S-1) (SJ)

Dear Mr. Iannuzzi:

Enclosed please find one CD containing the government's continued discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government hereby also requests reciprocal discovery.

The materials include:

(a) Accountant work papers relating to Global Development Initiative Foundation ("GDIF") (119684-119913);

(b) Accountant work papers relating to the defendant's personal income tax returns (119914-120040);

(c) An electronic file containing scanned documents (120041-121305) previously produced to the defendant as hard copy documents on February 28, 2011;

(d) Firstrade bank records (122407-122419; 123314-123635, and 123636-124075);

(e) Documents relating to foreign bank accounts (122440-122449);

(f) Phone records (122450-122522);

(g) Correspondence from St. John's University relating to gifts (122523-122527);

(h) Statements by the defendant (122528-122598);

(i) The defendant's personal income tax returns (122599-123144);

(j) Citi financial records (123145-123169, 123170-123171, 123172-123244, and 123245-123258);

(k) Diners Club records (123259-123313);

(l) Foxwoods Resort Casino records (124076-124245);

(m) Asia Bank records relating to GDIF (124246-124301);

(n) Internal Revenue Service records relating to GDIF (124302-124408);

(o) HSBC records relating to Homme Beauty Salon (124412-124735);

(p) Citi bank records relating to the defendant's son (125063-125315);

(q) Letter dated August 11, 2008 relating to the defendant's son (125316); and

(r) Travel and expense reimbursement forms for 2009 (125317-125350).

In addition, as discussed on January 19, 2012, you may call us to arrange a mutually convenient time to inspect, copy, and/or photograph documents collected from the defendant's

offices at St. John's University. Many of these documents have already been scanned and produced to you.

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
Charles Kleinberg
Lan Nguyen
Assistant U.S. Attorneys
(718) 254-6012/6162

Enclosures

CC: Clerk of Court (SJ) (w/o enclosures)